

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

ORIGINAL
FILE

In the Matter of
Billed Party Preference
for 0+ InterLATA Calls

CC Docket No. 92-77

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JUN 17 1992

Federal Communications Commission
Office of the Secretary

REPLY COMMENTS

The NYNEX Telephone Companies ("NTCs") hereby submit these Reply Comments in the above-captioned matter.

As might be expected, there is disagreement as to whether 0+ public domain is in the public interests. Most local exchange carriers ("LECs") support the NTCs' position that 0+ public domain is not in the public interest since it will increase customer confusion and dissatisfaction. On the other hand, the operator service providers (OSPs) argue that 0+ public domain will benefit competition in the operator services and payphone marketplace.

The American Public Communications Council (APCC) also argues that the Commission should order AT&T to cease providing validation data on its CIID cards to the BOCs.¹ The Commission should reject this proposal. The CIID card format

¹ The same issue was raised by Cleartel Communications, Inc., PhoneTel Technologies, Inc. and Zero Plus Dialing, Inc.

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0+5

was designed so that any interexchange carrier (IC) could issue calling cards that the BOCs could accept for intraLATA calls. The BOCs are not responsible for the fact that most ICs have chosen not to do so. Indeed, in its May 8, 1992 Order in Docket No. 91-115, the Commission ruled that the BOCs can honor AT&T's CIID card under a Mutual Honoring Agreement so long as the BOCs are willing to enter into similar agreements with other ICs on a nondiscriminatory basis. Order ¶ 36.

On February 28, 1992, the MFJ Court denied a similar request made by ITI, the Operator Service Providers of America and Capital Network System, Inc.² The Commission should similarly deny APCC's request here.

Respectfully submitted,
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and

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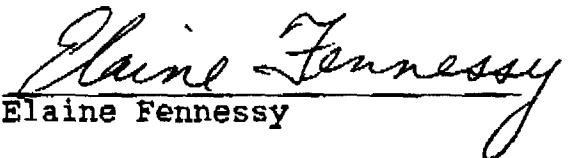
Their Attorneys

Dated: June 17, 1992

² United States v. Western Elec. Co., Inc., Civil Action No. 82-0192, Memorandum and Order (D.D.C. February 28, 1992). Subsequent to the Court's decision, ITI complained to the Department of Justice. That complaint was denied by the Department on May 7, 1992. See letter dated May 7, 1992 from Constance K. Robinson to Mitchell F. Brecher.

CERTIFICATE OF SERVICE

I certify that copies of the foregoing REPLY COMMENTS of the NYNEX Telephone Companies, were served on each of the parties listed on the attached Service List, this 17th day of June, 1992, by first class United States mail, postage prepaid.


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